

**Federal Defenders
OF NEW YORK, INC.**

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July 16, 2021

By ECF

Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: United States v. Jeremy Spence
21 Cr. 116 (LAK)**

Dear Judge Kaplan,

I write to respectfully request that the Court adjourn the conference that is currently scheduled for Tuesday, July 20, 2021 for approximately 4 weeks. The parties are in the midst of plea negotiations and need additional time to complete that process. The government, by Assistant United States Attorney Christine Magdo, consents to this application. The parties are available the week of August 16, 2021, if that works for the Court. (As noted, we are contemplating resolving this case without a trial, but if that should not come to pass, the instant adjournment will not interfere with the currently-scheduled trial date of November 30, 2021.)

Given the nature of this request, the defense consents to the exclusion of time under the Speedy Trial Act until the newly selected date.

Thank you for your consideration.

Respectfully submitted,

/s/
Sylvie Levine
Neil Kelly
Counsel for Mr. Spence